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MARYLAND STATE ARCHIVES

State Ethics Commission

ANNUAL REPORT 1987



STATE OF MARYLAND
EXECUTIVE DEPARTMENT

WILLIAM DONALD SCHAEFER
GOVERNOR



STATE ETHICS COMMISSION

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COMMISSION MEMBERS

M. PETER MOSER, CHAIRMAN
WILLIAM J. EVANS
REVEREND C. ANTHONY MUSE
BETTY B. NELSON
BARBARA M. STECKEL
JOHN E. O'DONNELL, EXECUTIVE DIRECTOR
NANCY L. SPECK, GENERAL COUNSEL
ROBERT A. HAHN, STAFF COUNSEL

STATE ETHICS COMMISSION

Ninth Annual Report

January 1, 1987 - December 31, 1987

NOTE: Reverend C. Anthony Muse replaced Reverend John Wesley Holland. Reverend Holland died on November 26, 1987. Reverend Muse attended his first meeting on February 22, 1988.

State Ethics Commission

Ninth Annual Report

January 1, 1987 - December 31, 1987

GENERAL STATUTORY IMPLEMENTATION

The State Ethics Commission met nine times during Calendar Year 1987. During the year the Commission was involved in program activity relating to all areas of its statutory mandate. These include financial disclosure, conflict of interest, lobbyist disclosure, local government ethics laws, school board ethics regulations, advisory opinions, enforcement matters and public information activities.

Issuance of Advisory Opinions

The Commission issues advisory opinions in response to requests from officials, employees, and others who are subject to the Law. Additionally, the Commission may issue advisory opinions to other persons. During Calendar Year 1987, the Commission received 36 requests for advisory opinions and issued 25 formal published opinions. There were seven requests for advisory opinions pending at the end of the calendar year. (Some of the original requests were handled without formal advice.) All of the formal opinions issued in 1987 involved the conflict of interest provisions of the Law. Most of these dealt with the employment or ownership interest prohibitions under section 3-103(a) of the Law. Other areas of the Law cited in opinions include the non-participation requirements, the prohibition against using position for personal gain, the post-employment restrictions and the misuse of confidential information. One factor reducing the number of formal opinion requests and opinions issued is the large number of existing opinions that can now be used for informal guidance. The Commission staff was able to provide guidance in about 325 potential situations based on existing opinions of the Commission. The Commission itself provided informal advice in lieu of formal guidance based on past opinions in 38 situations during the year.

Financial Disclosure

The administration of the financial disclosure program continued to involve the identification of those required to file, providing technical assistance to filers and monitoring compliance with the Law. Compliance review of forms was conducted as part of a phased program for review of the forms of all officials and employees. Currently there are over 5,000 officials filing financial disclosure forms. In addition, copies of all judicial official financial disclosure forms are also filed at the Commission office.

In addition to the regular financial disclosure program, gubernatorial appointees to boards or commissions seeking limited conflict of interest exemptions must file a form disclosing areas of existing conflicts with the Commission.

Lobbyist Disclosure and Regulation

During the lobbying year which ended on October 31, 1987, 662 lobbying registrations were filed with the Commission. This represents a decrease from the 685 registrations in the previous year. Although the largest number of lobbyists are registered during the legislative session, registrations are beginning and ending throughout the lobbying year, which begins on November 1 and ends on October 31 of the following year. Most persons registered to lobby have only a single registration representing one employer. However, forty-eight lobbyists had two or more registrations during this time period. Twenty-three registrants had four or more employers. The \$7,634,832 in expenditures reported for the period of October 31, 1987 represents an increase of \$842,404 over the previous year. Lobbying expenditures have significantly increased since the Commission reported \$2,864,454 of expenditures in 1979, the first year the Ethics Commission administered the filing program. An analysis of individual reports indicates that thirty-one lobbyists employers reported having total lobbying expenditures of \$50,000 or more. Reports of individual lobbyists registered on behalf of one or more employers indicate that twenty of these persons reported \$50,000 or more in compensation for services. Ten lobbyists reported compensation of \$100,000 or more. Topic areas involving large total employer expenditures during the reporting period included health, utilities, insurance, banking, real estate, business and labor. A list of those employers expending \$25,000 or more and those lobbyists reporting \$50,000 or more in compensation is included in the appendices of this report.

The following expenditure data summarizes lobbying expenditures for the last three lobbying years:

	<u>10/31/85</u>	<u>10/31/86</u>	<u>10/31/87</u>
1. Expenditures for meals and beverages for officials or employees or their immediate families.	\$ 234,615	\$ 267,738	\$ 306,145
2. Expenditures for special events, including parties, dinners, athletic events, entertainment, and other functions to which all members of the General Assembly, either house thereof, or any standing committee thereof were invited. (Date, location, group benefited, and total expense for each event are also reported.)	\$ 134,735	\$ 168,663	\$ 249,584
3. Expenses for food, lodging, and scheduled entertainment of officials and employees and spouses for a meeting given in return for participation in a panel or speaking engagement at the meeting.	\$ 8,067	\$ 15,134	\$ 12,056

	<u>10/31/85</u>	<u>10/31/86</u>	<u>10/31/87</u>
*4. Expenditures for gifts to or for officials or employees or their immediate families (not including sums reported in 1, 2, and 3).	\$ 285,811	\$ 228,228	\$ 295,707
<u>Subtotal of items 1, 2, 3, & 4</u>	\$ <u>663,228</u>	\$ <u>679,763</u>	\$ <u>863,492</u>
5. Total compensation paid to registrant (not including sums reported in any other section).	\$4,604,085	\$4,812,012	\$5,388,846
6. Salaries, compensation and reimbursed expenses for staff of the registrant.	\$ 422,828	\$ 342,357	\$ 437,286
7. Office expenses not reported in items 5 and 6.	\$ 380,676	\$ 465,614	\$ 462,829
8. Cost of professional and technical research and assistance not reported in items 5 and 6.	\$ 450,847	\$ 78,301	\$ 67,432
9. Cost of publications which expressly encourage persons to communicate with officials or employees.	\$ 136,280	\$ 233,396	\$ 222,431
10. Fees and expenses paid to witnesses.	\$ 28,238	\$ 5,409	\$ 10,851
11. Other expenses.	\$ 267,697	\$ 175,756	\$ 181,665
<u>Total of items 1 through 11</u>	\$ <u>6,953,879</u>	\$ <u>6,792,428</u>	\$ <u>7,634,832</u>

* This category includes the value of race track passes distributed by racing industry lobbyists to State officials. This activity began to be more fully reflected in the annual report figures in 1984. \$254,620 of the \$295,707 reported for gifts in the period ending 10/31/87 reflects value of these passes. In the previous year, \$212,410 was attributable to these passes.

Enforcement Activities

The Ethics Law and implementing rules of the Commission provide that any person may file a complaint with the Commission. Complaints must be signed under oath, and allege a violation of the Law by a person subject to the Law. Additionally, the Commission may file a complaint on its own initiative, and carries out preliminary inquiries at its discretion.

In Calendar Year 1987 the Commission issued or accepted one hundred and twenty-seven complaints. One hundred and nineteen complaints involved financial disclosure matters, five complaints related to conflict of interest issues, and three complaints involved the lobbying law. Also, during this year action was completed on

fifty-four complaints. Forty-nine of these completed complaint cases were financial disclosure matters, two were conflict of interest matters, and three were lobbying matters. Seventy-three complaints were still active at the end of the Calendar Year. The large number of financial disclosure complaints compared to eight in the previous year were in part caused by the double filing as a result of the savings and loan disclosure supplement forms filed during 1986. This, in effect, shifted late filing compliance well into 1987. Forty-three failure to file financial disclosure complaints were terminated by accepting late filing as a cure. Seven late financial disclosure filing cases were completed by an admission of violations, waiver of confidentiality, acceptance of a reprimand, and the payment of funds to the State in lieu of a potential fine. One complaint concluded with a finding of violation of the Law after a hearing. The processing of financial disclosure complaints has become an expensive and time consuming process. Although the number of people failing to file after two notices represents only about 2% of those required to file, the Commission believes that in lieu of resorting to court ordered fines, some financial sanction to those who continue to ignore the filing requirements even after a hearing notice has been issued, is necessary to insure timely availability of forms. Therefore, the Commission has announced a general settlement policy of requiring an admission of violation, a reprimand, and a \$100 payment in lieu of a fine in complaint cases where there is a second complaint of where the form is filed at any time after a hearing notice is sent to the non-filer. A hearing is generally scheduled at least 90 days after the report is due and follows two other notices and a complaint document.

Two conflict of interest complaints were completed in 1987. One complaint was completed by a dismissal based on the findings of the staff investigative report. In another complaint matter the matter was closed based on a cure agreement with the respondent. Action was completed on three late filing of lobbying activity report complaints. All of these complaints were completed by accepting late activity reports as a cure of the late filing violation. The Commission also initiated eight preliminary inquiries regarding either conflict of interest or lobbying matters during 1987 in order to evaluate whether a complaint should be filed. Five preliminary inquiries were still in process at the end of the year.

Local Government Ethics Laws

Maryland counties and cities are required under Title 6 of the Ethics Law to enact local laws similar to the State law. Criteria for evaluating similarity to the State Law are defined in Commission regulations. Municipalities, based on size and other factors, may be exempted from all or part of the requirement, though an exemption may be granted only in response to a written request. The Commission was primarily involved during 1987 in reviewing amendments to enacted laws.

In addition to the requirement that counties and cities enact ethics laws, the 1983 Session of the General Assembly amended the Law to require local school boards either to promulgate ethics regulations similar to the State Law or be covered by county ethics laws. The Commission issued regulations covering this requirement in 1983. Most of the staff activity relating to local ethics programs during 1987 involved providing technical assistance to local ethics officials regarding ongoing administration of local government ethics programs. A seminar for local government ethics officials is being planned for 1988.

Educational and Informational Activities

The Commission staff has been active in providing information to those covered by the Ethics Law, as well as other persons interested in its requirements. A substantial daily staff workload has involved advising employees, officials, candidates and lobbyists on how to complete forms and providing informal advice regarding possible conflicts of interest. The Commission staff has also assisted local government and school board officials in drafting their ethics laws and regulations. The staff has also provided technical advice to many local government ethics boards. A presentation on ethics requirements was made at the annual meeting of the Maryland Register of Wills.

The annual briefing for lobbyists and those interested in the operations of the lobbying law was held in Annapolis during the 1987 Session of the General Assembly. The Commission has continued to maintain an office in Annapolis during the legislative session in order to provide assistance in the completion of lobbying or financial disclosure forms. The Commission staff provided part of a special Executive Training Program sponsored by the Department of Personnel.

Part of the Commission's public information activity involved distribution of lists of registered lobbyists and provision of assistance to persons inspecting various forms filed with the Commission. Pamphlets describing the Ethics Law have been made available to management level employees in all State agencies. Another pamphlet covering ethics requirements for part-time members of State boards and commissions is also being distributed. A new pamphlet covering public access to Commission records and decision information is also available. The Commission has also initiated an ethics bulletin which covers prohibitions, rules, procedures and Commission decisions.

LEGISLATIVE RECOMMENDATIONS AND ISSUES

The Commission continues to review the adequacy of the Public Ethics Law as required by the statute. The following areas were specifically recommended by the Commission to the Executive as agency legislation for the 1988 Session of the General Assembly.

1. Participation in Matters Involving Adult Children

Section 3-101 of the Ethics Law prohibits an official or employee from participating in matters where the person's spouse, parent, minor child, brother or sister has an interest or is a party. The proposed legislation would add adult children to the direct participation prohibition.

This area of the Law is at issue frequently in advisory opinions and enforcement matters. Unfortunately, the Law has a significant omission in that there is no direct prohibition to keep an official from participating in matters involving an adult child. The Commission has specifically faced several serious situations where this omission has left the public or a State employee substantially unprotected from actual or potential abuse. Generally, these issues arise in the areas of procurement, personnel and regulatory action.

2. Clarifying and Strengthening Post-Employment Restrictions

The current public Ethics Law post-employment restrictions contain very technical language requiring close analysis to determine its application. Although the Commission understands the Law's intent to protect the public interest, standing alone it has weaknesses in providing guidance and in enforcement cases. This is particularly true in evaluating the conduct of higher level employees with primarily management responsibilities. This Commission has faced numerous post-employment matters in the past several years and has cases now pending. Most of these situations have resulted in serious appearance and conflict of interest problems. In some instances, application of the very technical standards in the current Law result in the allowance of activities that simply should not occur. The Commission believes these additional, more clearly stated standards of conduct will cover the kinds of specific problems the State is facing, maintain credibility in the Law, and not unduly restrict the careers of public employees. It is proposed that the current Law be supplemented with a section applying only to non-legislative officials as defined in the Law. Essentially, what is recommended is a prohibition against participation for compensation in post-employment matters for one year if the matter was in existence and part of the official's responsibility during the person's last 12 months of State service.

3. Commission Fining Authority and Appeals

This recommended change in the Law would add to the Commission's sanctioning power by providing that after the finding of a violation, it may levy a fine not to exceed \$1,000. There is also a need to clarify the procedures and review standards in situations where Commission decisions are appealed or require additional proceedings in Circuit Court.

The Commission is concerned about its limited sanctioning powers. It can reprimand, recommend personnel action by the appointing authority, and go to court to ask for fines. Additionally, the current Law is fairly clear as to the appeal route regarding Commission decisions, but is unclear as to the timing and the evidence to be considered by the Court (possibly a different court) in levying fines. It has occurred to the Commission that it could be ruled that the action on the fines would be a separate trial de novo even though the underlying action of finding a violation would be an appeal on the record. The existing Law already creates a long and expensive process. Clarifying procedures would help the Commission and counsel for respondents. Generally, in conflict of interest cases the violations result in some financial benefit to the employee. Often the possibility exists for an admission of violation in which an agreement is made to pay the gain received to the State. However, when this does not occur, the Commission believes it is left with the prospect of further protracted expensive litigation with inconsistent results where a violation is found. This means that as a practical matter in all but more serious cases there is no realistic effective way to deal with disclosure or conflict cases, particularly where employees have left their State job. In order to remedy current problems, the Commission is proposing its own limited fining authority leaving the possibility to go to court to get larger fines when necessary based on the record of the Commission proceeding. Commission proceedings are held under the Administrative Procedure Act.

4. Real Estate Partnership Disclosure

The Ethics Law generally requires the disclosure of all interests in real property. The Law was originally passed in the mid-seventies. An early opinion of the Financial Disclosure Advisory Board (a predecessor agency) took the position that partnership real estate did not have to be disclosed unless the filer held a one-third or greater interest in the partnership. This opinion relied on what is now the interest attribution provisions of Section 4-104(b) of the Law. The State Ethics Commission does not necessarily agree with this early opinion but in view of its long standing existence and the continued statutory language, it has not overruled it. The opinion has been cited to justify non-disclosure of real estate interests by some filers. The Commission, however, takes the position that if property is held directly in the name of the partners instead of the name of the partnership, then disclosure is required under the current Law. The ownership of real property is one of the most important categories of disclosure under the provisions of the financial disclosure Law. Partnership ownership is one of the most prevalent forms of investment ownership. Under the current Law it is relatively easy to hide significant interest in real property by holding the interest in the name of a partnership. (This is particularly true because of inadequacies in partnership disclosure generally. See recommendation number 5.) The proposed bill would strengthen the ability to monitor conflicts, deter unethical behavior through disclosure, and increase public confidence in the Law. It is proposed that the Law be amended to require disclosure of property held in the name of a partnership if a 5% or greater interest in the partnership is held by the filer.

5. Disclosure of Partnership Interests

There are various places on the current financial disclosure form where at least some minimal partnership interest disclosure might be required to be disclosed. This disclosure falls rather unevenly regarding whether a partnership gets disclosed and regarding the information to be disclosed. It is proposed that partnership interests be treated the same as interests in corporations for financial disclosure purposes. This would insure that these interests are disclosed and that important information is included in this disclosure. Partnership interest can be a significant source of conflicts.

6. Clarify the Impact of the Law Enforcement Officers Bill of Rights

The provisions of the Law Enforcement Bill of Rights have substantial impact on investigation and enforcement of matters relating to law enforcement officers. The Commission does not believe that this law was meant to impact on the operations of the State Ethics Commission. The Commission has been aware of several matters involving law enforcement officers that could involve violation of the Ethics Law. Often these cases can be properly deferred to criminal enforcement agencies. The Attorney General has issued an opinion which essentially eliminates Commission enforcement jurisdiction over police officers based on the limitations in the law enforcement bill of rights. The Commission believes, however, that this is not good State policy and that it is important for this issue to be expressly dealt with by the statute to avoid unnecessary controversy and litigation involving law enforcement officer ethics cases. (Prior to this Annual Report being formally released, the General Assembly passed and the Governor signed Commission legislation resolving this problem.)

Other Legislative Recommendations

The recommendations listed below were made in previous annual reports. The Commission continues to believe that these recommendations are appropriate, based on its experience in administering the ethics program:

- The law should be formally clarified to deal with fund raising by employees and officials that is not clearly regulated by the State election laws.

- There is a need to review whether the requirement that a lobbyist must always be in the physical presence of an official in order to be required to register should be retained in the Law.

- Some consideration should be given to removing the current language dealing with Commission review of forms in section 2-103(e), and substituting a provision for review consistent with standards to be established by the Commission.

- There is a need to consider adding former officials and employees to the persons prohibited from using confidential information under section 3-107 of the Law.

- The bi-county agency ethics regulations requirements should be reviewed to make sure that sufficient penalty provisions are provided and that the regulations as drafted meet the intent of the Law.

- In order to avoid uncertain and confusing application and administration of the Law, the special provisions of section 6-202 making members of State boards funded in whole or in part by Baltimore County subject to the county disclosure law instead of the State law should be considered for elimination.

- The current law does not seem to clearly deal with gifts from foreign governments. There is a need to review this issue and clarify the law.

- The criteria for financial disclosure by executive and legislative branch officials utilize qualitative considerations in addition to salary. The financial disclosure standards for judicial branch employees utilize only a salary standard. As a result of this standard, certain judicial personnel such as court reporters are included in the filing requirements. The Commission believes the judicial financial disclosure standards should be amended to include qualitative criteria in addition to salary.

- The provisions for confidentiality in the Ethics Law should be reviewed to determine if they adequately protect privacy without denying needed information to operational agencies or the public.

- Consideration should be given to having new officials file a financial disclosure statement covering their holdings as of the time when they come into their position rather than for the previous calendar year.

- The Ethics Law prohibits certain types of representation before State agencies. However, except for legislative disclosure under section 3-102 of the Ethics Law, there is no required disclosure of representation before state agencies. It is recommended that officials who appear before State agencies for compensation include on their annual disclosure form at a minimum the identity of any agencies involved in this compensated representation.
- The need for disclosure of interests in mutual funds should be reviewed to determine if this information is fully necessary to accomplish the purposes of the Law.
- The provisions of section 4-104(c) regarding attributable interests should be modified to reduce the burden caused by the disclosure requirements when a person has a small share in a large diverse testamentary trust.
- The provisions covering school board ethics regulations need to be strengthened to assure that there are adequate sanctions for violations by board members, candidates for board membership and lobbyists.
- Judicial candidates should be required to file financial disclosure in each year of their candidacy in the same way as other State officials.
- In election years improperly filed candidate's disclosure forms create unique enforcement problems. Before a violation can be found and made public a variety of confidential administrative and adjudicatory processes have to occur. In most cases this process would extend well beyond the primary election and probably beyond the general election. This means that serious completion problems or even false disclosure could exist unknown to the voting public. A review should be made by the Executive and the General Assembly to determine whether confidentiality should be eliminated for candidate's financial disclosure enforcement cases at an earlier point in the enforcement process.
- The Ethics Law prohibits employees and non-elected officials from intentionally using their prestige of office for their own private gain or that of another. Elected officials, however, are not covered by this provision. In the last nine years, the Commission has received allegations involving various elected officials under its authority alleging that they had misused their position for their own gain or gain of another. Because the Law does not cover this type of activity by elected officials, the Commission has been unable to respond to these allegations. The Commission recommends that section 3-104 of the existing Law be amended to include elected officials, or that a new provision covering these officials dealing with clear cases of abuse should be specifically added to the Law.
- Issues regarding the spouses of employees or officials have arisen in Maryland and on a national basis. The Maryland Public Ethics Law does not consistently and clearly address these issues or provide sufficient policy guidance in these matters. Spouse ethics issues have become more prevalent in part as a reflection of both spouses having careers and other economic relationships.

The Law does not clearly deal with the acceptability of gifts to spouses of officials or employees by prohibited donors. Additionally, the financial disclosure provisions do not clearly require gifts received by the spouse to be disclosed by the employee or official even where such gifts are from donors normally requiring official disclosure. Another significant area needing further clarification is under what circumstances is the ownership interest of a spouse to be attributed to the official or employee for conflict of interest purposes under section 3-103(a) of the Ethics Law.

APPENDIX 1

EMPLOYER SPENDING \$25,000 OR MORE - ALL REGISTRANTS - ALL TYPES OF EXPENSES

NOVEMBER 1, 1986 - OCTOBER 31, 1987

<u>TOTAL AMOUNT</u>	<u>EMPLOYER</u>
1. \$204,703.54	Health Facilities Association of Maryland
2. 182,630.50	Maryland Chamber of Commerce
3. 112,890.23	Medical Mutual Liability Insurance Society of Maryland
4. 108,274.66	Citibank (MD), N.A. T/A CHOICE
5. 100,389.93	Md. State & D.C. AFL-CIO
6. 95,719.23	Maryland Classified Employees Assn.
7. 95,423.22	Perpetual Savings Bank, F.S.B.
8. 93,623.55	Maryland Hospital Association
9. 92,025.90	C & P Telephone Company of Maryland
10. 91,501.57	Maryland Bankers Association
11. 89,766.38	A T & T
12. 81,598.79	Potomac Electric Power Co.
13. 80,542.33	Medical & Chirurgical Faculty of State of Maryland
14. 80,383.00	Baltimore Gas & Electric Co.
15. 77,852.43	Associated Builders and Contractors
16. 73,030.59	Cable TV Assn. of MD, DEL, & D.C.
17. 71,468.68	Tobacco Institute
18. 70,704.24	St. of Md. Institute of Home Builders
19. 67,290.55	MNC Financial, Inc.
20. 66,864.47	Bethesda Chevy Chase Chamber of Commerce
21. 65,780.00	Blue Cross & Blue Shield
22. 63,519.91	Common Cause/Md.

23.	62,343.10	Chemical Industry Council of Maryland
24.	61,944.85	Marylander's for Blue Law Repeal
25.	60,162.51	Maryland Natural Gas
26.	59,770.87	Planned Parenthood of Maryland
27.	58,620.04	Maryland Society of Eye Physicians and Surgeons
28.	54,695.76	Maryland Assn. of Boards of Education
29.	52,590.08	Maryland State Teachers Association
30.	52,401.51	Crown Central Petroleum Corp.
31.	51,151.35	Nationwide Mutual Insurance Co.
32.	48,505.30	Maryland State Dental Association
33.	48,135.72	Maryland Trial Lawyers Association
34.	48,133.97	Automobile Trade Assn. of Maryland
35.	48,129.88	Marylander's for Malpractice Liability Reform
36.	47,523.30	National Rifle Association
37.	46,997.29	Marylander's for the Right to Choose
38.	46,782.66	Maryland Citizen Action Coalition
39.	44,563.16	National Assn. of Independent Insurers
40.	43,943.03	Household International
41.	43,759.15	Johns Hopkins Health System
42.	43,532.92	AAA Maryland
43.	43,098.41	Apartment & Office Building Assn.
44.	42,968.11	CSX Transportation
45.	41,290.59	National Federation of Independent Businesses
46.	40,388.98	UNISYS Corp.
47.	38,019.64	Maryland Association of Realtors
48.	37,584.52	Montgomery County Board of Realtors
49.	37,351.54	State Farm Insurance Companies

50.	37,263.72	Licensed Beverage Distributors of Md.
51.	36,718.78	FMC Corporation
52.	36,632.37	Chase Manhattan Bank, N.A.
53.	36,408.43	MCI Communications Corp.
54.	35,753.93	Maryland Retail Merchants Assn.
55.	35,389.35	Bethlehem Steel Corporation
56.	35,123.25	Citizens Rights Committee
57.	34,529.57	Maryland Farm Bureau, Inc.
58.	34,203.75	Joseph E. Seagram & Sons, Inc
59.	34,141.13	Group Hospitalization and Medical Services
60.	32,903.68	Maryland Psychological Assn.
61.	32,555.00	Maryland Independent College & University Assn.
62.	32,139.53	First National Bank of Maryland
63.	31,657.09	Mid-Atlantic Food Dealers Association
64.	31,349.13	Maryland Assn. of Community College Trustees
65.	31,109.00	Kaiser Foundation Health Plan of the Mid-Atlantic States, Inc.
66.	30,482.51	American Petroleum Institute
67.	30,470.69	Bell Atlantic Mobile Systems, Inc.
68.	30,339.18	Maryland State Funeral Directors
69.	30,233.54	Spectron, Inc.
70.	30,224.89	Maryland Assn. of Chain Drug Stores
71.	30,221.18	Lutheran Church in America
72.	30,108.00	Prince George's County Government
73.	29,736.50	American Insurance Association
74.	29,497.18	Soap and Detergent Assn.
75.	29,186.99	Johns Hopkins University
76.	28,645.47	Maryland League of Financial Institutions

77.	28,289.46	Association of Maryland Pilots
78.	28,062.81	Allen Group
79.	27,792.84	Washington Healthcare Management Corp.
80.	26,855.85	Mid-Atlantic Toyota Distributors, Inc.
81.	26,812.00	Qualified University Accumulation and Disbursement System
82.	26,326.09	Anne Arundel Board of Realtors
83.	26,035.84	Property Owners Assn. of Greater Baltimore, Inc.
84.	25,459.16	Guardian Interlock Systems, Inc.
85.	25,407.36	Maryland Legislative Board
86.	25,099.85	Maryland Catholic Conference
87.	25,084.49	Maryland Motor Truck Association, Inc.
88.	25,075.56	Consulting Engineers Council of Maryland

Note: This report does not include \$254,620 represented in the value of race track passes distributed by representatives of that industry.

APPENDIX 2

LOBBYISTS RECEIVING \$50,000 OR MORE IN COMPENSATION - ALL CLIENTS

November 1, 1986 - October 31, 1987

<u>AMOUNT</u>	<u>LOBBYIST</u>
1. \$702,912.95	Bereano, Bruce C.
2. 229,222.77	Doyle, James J., Jr.
3. 193,592.00	Goldstein, Franklin
4. 185,929.00	Burridge, Carolyn T.
5. 182,304.50	Cooke, Ira C.
6. 141,000.00	Manis, George N.
7. 140,958.38	Doolan, Devin John
8. 140,954.61	McCoy, Dennis C.
9. 122,499.00	Rummage, Frederick C.
10. 110,000.00	Schwartz, Joseph A. III
11. 95,866.70	Goeden, James P.
12. 83,000.00	Wyatt, Maurice R.
13. 81,643.50	Adler, Maxine
14. 76,203.08	Pitcher, J. William
15. 71,246.71	Neil, John B.
16. 70,414.50	Canning, Michael F.
17. 70,020.43	Doherty, Daniel T., Jr.
18. 53,000.00	Rombro, Richard T.
19. 52,856.48	Epstein, Harvey A.
20. 50,250.00	Middleton, Michael G.

